CALPINE

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May 24, 2004

Mr. Steve Munro
Compliance Project Manager
Sutter Energy Center
Docket No. 97-AFC-2
California Energy Commission
1516 Ninth Street (MS-2000)
Sacramento, CA 95814-5512

Via Fed Ex

RE: SUTTER ENERGY CENTER PETITION TO AMEND CONDITION OF CERTIFICATION AQ-32-11-REVISED LANGUAGE
97-AFC-2

Dear Mr. Munro:

Pursuant to Section 1769 (Post Certification Amendments and Changes) of the California Energy Commission ("CEC") Siting Regulations, the Sutter Energy Center, LLC ("SEC") hereby submits the attached Petition to amend one section of Condition of Certification (COC) AQ-32-11.
AQ-32-11 states, "The maximum hourly emissions from each gas turbine/duct burner are given in the table below and shall be averaged over a rolling three hour period, except for the NOx emissions, and all hourly startup emission rates, which shall be averaged over a one hour period".
Due to cold turbine startup constraints, the Sutter Energy Center respectfully requests an amendment to AQ-32-11 to: "The maximum hourly emissions from each gas turbine/duct burner are given in the table below and shall be averaged over a rolling three hour period, except for NOx emissions and NOx, VOC, PM_{10}, and SO_2 hourly startup emission rates, which shall be averaged over a one hour period".

Please do not hesitate to contact me at (530) 821-2074 should you have any questions regarding this submittal.

Respectfully Submitted,

Ms. Diane Tullos
Compliance Manager
Sutter Projects

Enclosure

cc: Steve Speckert, FRAQMD
B. McBride, Calpine

PETITION TO AMEND SEC's COC AIR QUALITY CONDITION-32-11 (AQ-32-11)

Pursuant to the California Code of Regulations Section 1769 (a)(1)(A), a description of the proposed amendment to SEC's COC AQ-32-11 is required.

With this petition, SEC is requesting a post-certification amendment to AQ-32-11. The proposed amendment requests a change in the Startup CO #/hr averaging from a 1-hour average to a 3-hour rolling average.

Pursuant to Section 1769 (1)(B) and (C), a discussion of the necessity for the proposed modification and whether the modification is based on information that was known by the petitioner during the certification proceeding is required.

During cold startups of the combustion turbines, compliance with the startup CO #/hr limit averaged over 1-hour is not consistently achievable. During cold startups, the CO catalyst is at ambient temperature. The majority of CO emissions during startup occur during the first 20-30 minutes of the first hour. The CO emissions rapidly drop off after this first 20-30 minutes when the CO catalyst reaches a temperature of 200-250°F. Currently, AQ-32-11 limits the startup CO #/hr to 902 #/hr averaged over a one-hour period; the CO #/hr limit during normal operations is averaged over a rolling 3-hour average.
The majority of cold startups, to date, have met the CO #/hr limit averaged over 1-hour, but a recent cold startup during the month of February when the ambient temperature was approximately 56° F exceeded the 1-hour average but was in compliance with the EPA's PSD limit of 902 #/hr averaged over a rolling 3-hour average.

Pursuant to Section 1769 (1)(D), a discussion is required on whether the proposed modification is based upon new information that changes or undermines the assumptions, rationale, findings, or other bases of the Final Decision and explanation why it should be permitted.

The majority of cold startups, to date, have met the CO #/hr limit averaged over 1-hour, but a recent cold startup during the month of February when the ambient temperature was approximately 56° F exceeded the 1-hour average but was in compliance with the EPA's PSD limit of 902 #/hr averaged over a rolling 3-hour average.

Pursuant to Section 1769 (1)(E), an analysis of the impacts the modifications may have on the environment and proposed measures to mitigate any significant adverse impacts is required.

The requested modification does not request an increase in any emissions limit.

Pursuant to Section 1769 (1)(F), a discussion of the impact of the modification on the facility's ability to comply with applicable laws, ordinances, regulations, and standards is required.

SEC asserts the proposed changes contained in this Post-Certification Amendment Petition do not pose any impacts on the facility's ability to comply with all applicable laws, ordinances, regulations, and standards.

Pursuant to Section 1769 (1)(G), a discussion of how the modification affects the public is required.

SEC further asserts the proposed modifications contained in this Post-Certification Amendment Petition will not cause any additional impacts or require additional mitigation measures and will not adversely affect the public.

Pursuant to Section 1769 (1)(H), a list of property owners potentially affected by the modification is provided below:

It is SEC's belief the proposed amendment is administrative in nature, therefore, no property owners will be affected by the modification proposed.

Pursuant to Section 1769 (1)(I), a discussion of the potential effect on nearby property owners, the public, and the parties in the applicable proceedings is required.

It is SEC's belief the proposed amendment will not result in any changes that would affect nearby property owners, the public, or any parties that participated in the application proceedings.

Consistent with the requirements of Section 1769 (a) (1)(A), SEC is requesting approval of the revised startup CO #/hr averaging from 1-hour to 3-hours.

Attachment 1

Proposed Change to Condition of Certification

AQ-32 (11) The maximum hourly emissions from each gas turbine/duct burner are given in the table below and shall be averaged over a rolling 3-hour period, except for the NOx emissions, and NOx, VOC, PM_{10}, and SO_2 hourly startup emission rates, which shall be averaged over a one-hour period. Additionally excepting the total emissions per startup and total emissions per shutdown, which are not averaged over any time frame.